

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

BILLJCO, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-00528-ADA

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND**

Defendant Apple Inc. (“Apple”) hereby moves the Court for an order extending the time for Apple to answer, move, or otherwise respond to BillJCo, LLC’s (“BillJCo” or “Plaintiff”) Complaint for Patent Infringement (Dkt. 1). The deadline for Apple to answer, move, or otherwise respond to BillJCo’s Complaint is June 18, 2021. Apple requests a 45-day extension of time to answer, move, or otherwise respond to BillJCo’s Complaint to August 2, 2021. Plaintiff does not oppose Apple’s request. The request is not sought for purposes of delay and will not affect any other case deadlines. Therefore, Apple respectfully requests that the Court extend the deadline for Apple to answer, move, or otherwise respond to BillJCo’s Complaint to August 2, 2021.

Dated: June 13, 2021

Respectfully submitted,

/s/ John M. Guaragna

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ATTORNEY FOR DEFENDANT  
APPLE INC.

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Defendant Apple conferred with BillJCo's counsel.

Plaintiff does not oppose Apple's request sought in this motion.

/s/ John M. Guaragna  
John M. Guaragna

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of June 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing via electronic mail to all counsel of record. Any other counsel of record will be served by first class U.S. mail.

/s/ John M. Guaragna  
John M. Guaragna